

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JASON FARINA, CHARLES GARDNER,
DOROTHY TROIANO, DELORIS RITCHIE
and MIRIAN ROJAS on behalf of each of
themselves and all others similarly situated,

Plaintiffs,

vs.

METROPOLITAN TRANSPORTATION
AUTHORITY, TRIBOROUGH BRIDGE AND
TUNNEL AUTHORITY, THE PORT
AUTHORITY OF NEW YORK AND NEW
JERSEY, NEW YORK STATE THRUWAY
AUTHORITY, TRANSWORLD SYSTEMS,
INC., ALLIANCEONE RECEIVABLES
MANAGEMENT, INC., LINEBARGER
GOGGAN BLAIR & SAMPSON, LLP and
CONDUENT, INC.,

Defendants.

Hon. Naomi R. Buchwald, U.S.D.J.

CIVIL ACTION NO.:

18-01433 (NRB)

Civil Action

NOTICE OF MOTION

PLEASE TAKE NOTICE that defendant, The Port Authority of New York and New Jersey (the “Port Authority”) by its attorney, The Port Authority of New York and New Jersey Law Department, will move this Court at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, before the Honorable Naomi Reice Buchwald at such date and time as to be determined by the Court, based upon the attached declaration of Charles Fausti, and exhibits thereto, and Defendant’s memorandum of law in support of the motion for an order to dismiss the claims of Plaintiffs set forth in the Complaint for failure to state a claim upon which relief may be granted pursuant to Fed. R. Civ. P. 12(b)(6) and striking the class allegations pursuant to Fed. R. Civ. P. 23(c)(1)(A), 23(d)(1)(D) and 12(f).

Dated: New York, New York
September 14, 2018

Respectfully submitted,

PORT AUTHORITY LAW DEPARTMENT
Attorney for Defendant,
The Port Authority of New York and New Jersey

By: /s/ David R. Kromm
David R. Kromm, Esq.
4 World Trade Center
150 Greenwich Street, 24th Floor
New York, New York 10007
Telephone No.: (212) 435-3483

To: All Counsel of Record (*via ECF*)